

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

RUSTEM KAZAZI, et al.

Movants,

v.

U.S. CUSTOMS AND BORDER  
PROTECTION, et al.

Respondents.

No. 1:18-MC-00051-DAP

JUDGE DAN AARON POLSTER

**JOINT MOTION FOR EXTENSION OF TIME TO FILE OPPOSITION TO MOVANTS'  
MOTION FOR ATTORNEY FEES AND COSTS**

Movants Rustem, Lejla, and Erald Kazazi respectfully submit this Joint Motion for Extension of Time to File Respondents' Opposition to Movants' Motion for Attorney Fees and Costs. Under this Court's order of November 21, 2018, the Respondent's response to Movants' motion for attorney fees and costs is currently due January 9, 2019. Due to the lapse in appropriations for the Department of Justice, counsel for Respondents has been unable to complete work on that response and will not be able to resume work until funding is restored.<sup>1</sup> As a result, the parties respectfully request that Respondents' time to file their response brief be extended by twenty-one (21) days, with a new deadline of January 30, 2019.

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<sup>1</sup> Undersigned counsel has communicated with counsel for Respondents via email and is filing this motion as a professional courtesy in light of the serious time constraints imposed on Respondents' counsel by the lapse in appropriations.

DATED this January 4, 2019.

Respectfully submitted,

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*Counsel for Movants*

### **CERTIFICATE OF SERVICE**

I hereby certify that on January 4, 2019, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to Respondents indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Robert J. McNamara  
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